IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MISSOURI SOUTHEASTERN DIVISION

BADER FARMS, INC. and)	
BILL BADER,)	
)	
Plaintiffs,)	MDL No. 1:18-md-02820-SNLJ
v.	.)	
	()	Indiv. Case No. 1:16-cv-00299-SNLJ
MONSANTO COMPANY and)	
BASF CORPORATION,).	
)	,
Defendants.)	•

JOINT STIPULATION REGARDING MONSANTO COMPANY'S NET WORTH

Defendant Monsanto Company ("Monsanto") and Plaintiff Bader Farms, Inc., by counsel, stipulate the following regarding Monsanto's financial condition:

- 1. Monsanto's net worth in 2017 was \$6.5 billion;
- 2. Monsanto's net worth in 2018 was \$7.8 billion.

¹ Monsanto moved to exclude all evidence of, or argument characterizing, its financial condition. ECF #301 at 15-16. The Court denied the motion to exclude that evidence and held that evidence of Monsanto's net worth was admissible for punitive damages. See 1/24/20 Hearing Tr. at 69:18-70:9. By submitting this stipulation, Monsanto does not waive its argument that evidence of its financial condition is irrelevant and should be excluded.

Respectfully Submitted,

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By: /s A. Elizabeth Blackwell

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UNITED STATES DISTRICT COURT SOUTHEASTERN DIVISION

BADER FARMS, INC. and)
BILL BADER,)
Plaintiffs,) MDL No. 1:18-md-02820-SNLJ
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v	
MONICANITO COMPANIA	
MONSANTO COMPANY and BASF Corporation,	
BASE Corporation,	
Defendants.	,

DECLARATION OF MELANIE SCHMITZ

- 1. My name is Melanie Schmitz. I am the Accounting Business Partner for U.S. Crop Science for Bayer U.S. LLC, formerly known as Monsanto Company, and am aware and have personal knowledge of the facts regarding the matters reflected below.
- 2. I am familiar with the audited financial statements for Monsanto Company, the most recent of which is dated February 28, 2018.
- Based on my review of the most recent audited financial statements for 3. Monsanto Company, its net worth in 2017 was \$6.5 billion.
- Based upon my review of the most recent audited financial statements for Monsanto Company, its net worth in 2018 was \$7.8 billion.

Melanie Schmitz, Accounting Bus

Partner for U.S. Crop Science